

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

SHANTA LYNETTE BROWN,)	
and)	
AQUASHA SANDIDGE,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action: 6:23cv00054
)	
THE CITY OF LYNCHBURG, <i>et al.</i> ,)	
)	
Defendants.)	

DEFENDANTS' RULE 26(a)(3) DISCLOSURES

Defendants City of Lynchburg, Seth Reed, Zachary Miller, and Robbin Miller
(collectively, the "Defendants"), by counsel, hereby make the following disclosures concerning
exhibits and witnesses for trial:

I. WITNESSES

A. The Defendants intend to call the following witnesses at the trial in person:

1. Plaintiffs Shanta Brown and Aquasha Sandidge (live and by deposition), concerning their communication, observations and actions relevant to the issues in this case.
2. Defendants Seth Reed, Zachary Miller and Robbin Miller will testify concerning their response to the incident at issue on April 28, 2020, their encounters with the Plaintiffs and their observations, involvement, communications and actions relevant to the issues in this case.
3. Tereika Grooms, 1110 Jordan Drive, Big Island, VA. Ms. Grooms was a Lynchburg Police Dept. Officer at the time and will testify concerning her recall of her response to the incident at issue on April 28, 2020, and will testify concerning her encounters with the Plaintiffs and her observations, involvement, communications and actions relevant to the issues in this case.
4. Lt. S. Grady Orr, Mechanicsville, VA. Lt. Orr is the Defendants' expert and will testify in accordance with his opinions and findings relevant to the issues in this case.

B. The Defendants may call the following witnesses at the trial in person:

1. Terron Pannell, 1010 Clay Street, Lynchburg, VA. Mr. Pannell will testify concerning his recall of the events and his involvement, communications and actions relevant to the issues in this case.
2. Officer Brandon Isner, Lynchburg Police Dept., 905 Court St., Lynchburg, VA. Officer Isner will testify as supervisor responsible for oversight in this matter concerning Lynchburg Police Dept.'s on-site response at the apartment complex on April 28, 2020, and his recall of his interactions, involvement, communications and actions in the circumstances relevant to the issues in this case.
3. Officer Thomas Hall, Lynchburg Police Dept. 905 Court St., Lynchburg, VA. Officer Hall will testify concerning his recall of his involvement, communications and actions relevant to the issues in this case.

- C. The Defendants reserve the right to call any persons identified in discovery responses or witness disclosures about whom the Defendants have not objected, including to present such witness' testimony through their depositions.
- D. The Defendants also reserve the right to call any witnesses not identified herein necessary to impeach or to rebut any testimony or other evidence introduced on behalf of the Plaintiff.
- E. The Defendants reserve the right to call impeachment or rebuttal witnesses not included on this list.

II. EXHIBITS

A. The Defendants may offer the following as exhibits at trial:

1. Body cam and dash cam video footage from Officers Zachary Miller, Seth Reed, Tereika Grooms, Brandon Isner and Thomas Hall, marked CITY 000023-000025, 000028 and 000030.
2. Dispatch Record, marked CITY 000001-000003 and Incident Report, marked CITY 000004-000015.
3. Injury Report, marked CITY 000050.
4. Warrant and case disposition, related to the April 28, 2020 incident and charge, marked DEFS 000001-000023.

5. Cell phone recording by Aquasha Sandidge produced by Plaintiffs, labeled 2024-10-25-Shanta Brown – LiveStream Video.mov.
 6. Any exhibits identified by the Plaintiff in pre-trial disclosures to which the Defendants have not objected.
- B. Defendants reserve the right to use any exhibits identified in discovery or by the Plaintiffs and reserve the right to introduce other documents as necessary for impeachment and rebuttal at trial.
- C. Defendants reserve the right to read the transcript of the designated portions of the following deposition(s):

Witness/Deponent

Shanta Brown

Designation

15:5-16:6

16:21 (begin at “Officer”)-17:23 (end at “this”)

21:20-22:11

23:1-20

24:11-24

27:4-10

30:1-15

35:24-36:8

Aquasha Sandidge

7:9-8:1

8:15-23 (end at “No”)

12:18-23

13:8-11

13:22-14:7

16:18-23

17:25-18:8

20:10-24

CITY OF LYNCHBURG, SETH REED,
ZACHARY MILLER, and ROBBIN MILLER

By /s/ John R. Fitzgerald
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CERTIFICATE OF SERVICE

I do hereby certify that on this 10th day of January, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to:

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